

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

DECLARATION OF LEITA WALKER

I, Leita Walker, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

1. I am one of the attorneys for Defendant Netflix, Inc. in the above-captioned action. I have personal knowledge of the matters set forth herein. I make this declaration in support of Netflix's Motion to Compel Production of Documents Responsive to Subpoena to Michael Griesbach.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action to Michael C. Griesbach as served on Mr. Griesbach on February 10, 2022.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Objection to Defendant Netflix, Inc.'s Subpoena to Attorney Michael Griesbach as served by counsel for Mr. Griesbach on Netflix, Inc. on February 24, 2022.

4. Attached hereto as Exhibit 3 is a true and correct copy of a March 8, 2022 letter sent by me to John F. Mayer, counsel for Mr. Griesbach in this matter, regarding Mr. Griesbach's objections to the Subpoena and seeking an opportunity to meet and confer regarding Mr. Griesbach's objections.

5. Attached hereto as Exhibit 4 is a true and correct copy of email correspondence between myself and Mr. Mayer regarding the scheduling of counsels' meet-and-confer, as well as correspondence exchanged after counsel's meet-and-confer.

6. Attached hereto as Exhibit 5 is a true and correct copy of email correspondence produced by the Manitowoc County Sheriff's Department in response to a subpoena served by Netflix, Inc., bates stamped Manitowoc-016498.

7. Attached hereto as Exhibit 6 is a true and correct copy of a document produced by the Manitowoc County Sheriff's Department in response to a subpoena served by Netflix, Inc., bates stamped Manitowoc-000065-068.

8. Attached hereto as Exhibit 7 is a true and correct copy of email correspondence sent by Mr. Griesbach to Producer Defendants Laura Ricciardi and Moira Demos, which I obtained from counsel for the Producer Defendants.

9. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of September 22, 2005 Mr. Griesbach, in *Avery v. Manitowoc Cty.*, No. 04 C 986.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 22, 2022

/s/ Leita Walker
Leita Walker